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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|---------------------------|---|--------------------------------------|
| UNITED STATES OF AMERICA, |) | No.: CR 14 0196 CRB |
| |) | |
| v. |) | UNITED STATES' MOTION TO SEAL MOTION |
| |) | FOR MISCELLANEOUS RELIEF AND |
| KWOK CHEUNG CHOW, et al. |) | [PROPOSED] ORDER |
| |) | |
| Defendants. |) | |

The United States of America, by and through Assistant United States Attorneys William Frentzen, Susan E. Badger, and S. Waqar Hasib, respectfully submits this motion requesting that the Court order that the United States' Motion for Miscellaneous Relief and any resulting order be filed under seal.

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1 As grounds for this motion, the United States states that the content of the United States' Motion for
2 Miscellaneous Relief contains material that is governed by a protective order, including sensitive
3 information about particular witnesses.

4 WHEREFORE, the United States respectfully requests that the Court order that the United States'
5 Motion for Miscellaneous Relief and any resulting order be sealed until further order of the Court for the
6 reasons set forth herein.

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8 DATED: September 11, 2015

Respectfully submitted,

9 BRIAN J. STRETCH
Acting United States Attorney

10 _____
11 /s/
12 WILLIAM FRENTZEN
13 SUSAN E. BADGER
14 S. WAQAR HASIB
Assistant United States Attorneys

15 [PROPOSED] ORDER

16 Upon the motion of the United States, and good cause appearing, IT IS HEREBY ORDERED
17 THAT the United States' Motion for Miscellaneous Relief in the above-captioned case be filed under
18 seal until further notice from this Court.

19 IT IS SO ORDERED.

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21 DATED: September _____, 2015

22 _____
HONORABLE CHARLES R. BREYER
United States District Court Judge